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EAST LLC

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEW JERSEY

In re:)	
)	Case No. 19-20107(KCF)
)	
LYNN LEONARDO)	Chapter 13
)	
)	Hearing date: 7-24-19
)	
)	
)	OBJECTION TO CONFIRMATION
)	
)	

Ford Motor Credit Company LLC, servicer for CAB EAST LLC, the lessor of a 2017 FORD ESCAPE to the debtor, objects to the debtor's plan for the following reasons:

- a. The debtor must assume the lease and pay all lease payments directly to Ford Motor Credit Company LLC in accordance with the terms of the lease and must either immediately purchase the vehicle or surrender it at lease end, and the plan must so provide.
- b. The vehicle must be insured with comprehensive and collision insurance coverage and liability coverage in accordance with the requirements contained in the lease.
- c. Prepetition lease arrears must be cured promptly and paid to Ford Motor Credit Company LLC concurrently with or prior to

payment of counsel fees, and in all events, prepetition arrears must be paid within 6 months of filing, OR before the lease terminates, whichever occurs first.

- d. Presently the plan **REJECTS THE LEASE**. If the lease is not assumed, the automatic stay and co-debtor stay will terminate at the conclusion of the confirmation hearing in accordance with 11 U.S.C. 365(p)(3).

/s/ John R. Morton, Jr.
John R. Morton, Jr., attorney
for Ford Motor Credit Company LLC

Dated: 6-11-19